



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP
F. #2015R00998

*271 Cadman Plaza East
Brooklyn, New York 11201*

November 12, 2016

By ECF

The Honorable Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Imran Rabbani
Criminal Docket No. 15-302 (MKB)

Dear Judge Brodie:

The government respectfully submits this letter in response to the defendant's November 4, 2016 letter requesting the return of his birth certificate, Social Security card, and New York State identification card ("identification documents"), and to the Court's order of November 4, 2016, directing the government to return these identification documents to the defendant on or before November 11, 2016.

On September 27, 2016, counsel for the defendant informally requested the return of these identification documents from the government, indicating that the defendant had stated that the identification documents were located in a black folder seized pursuant to a search warrant executed upon the defendant's residence on or about June 13, 2015. Since the defendant first made that request, the government has determined that it did not seize any of these identification documents from the defendant's residence. Specifically, the search warrant return does not reflect the seizure of these identification documents or of any black folder, the case agents responsible for the search of Rabbani's residence do not recall such identification documents being taken, and a diligent search of the FBI's holdings for this case did not turn up any such identification documents.

The government has located the defendant's New York State learner permit card, which had been seized from the defendant's person at the time of his arrest. On November 10, 2016, the government sent the learner permit card to the defendant's counsel by Federal Express.

Respectfully submitted,

ROBERT L. CAPERS
United States Attorney

By: /s/ Douglas M. Pravda
Douglas M. Pravda
Assistant U.S. Attorney
(718) 254-6268

cc: Clerk of the Court (MKB) (by ECF)
Richard Willstatter, Esq., counsel for the defendant (by email and ECF)